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*Attorneys for Jun Dam and the Class in
Dam v. Perkins Coie, LLP, et al.,
Case No. 2:20-cv-00464-SAB (E.D. Wash.)*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC., a Washington
corporation,

Debtor.

Case No: 18-03197 FPC 7

Hon. Frederick P. Corbit
Chapter 7

**DECLARATION OF THOMAS J.
O'REARDON II IN SUPPORT OF
MOTION TO ADMIT *PRO HAC*
*VICE***

[No Hearing Requested]

1 I, Thomas J. O'Reardon II, under penalty of perjury, declare the following
2 statements to be true and correct, based on my personal knowledge and
3 information:

4 1. I am a partner of Blood Hurst & O'Reardon, LLP, and one of the
5 attorneys of record for Creditor Jun Dam.

6 2. I make this declaration in support of the motion for my admission to
7 practice *pro hac vice* before this Court for the limited purpose of this litigation.

8 **A. Applicant's address and telephone number**

9 Blood Hurst & O'Reardon, LLP
10 501 West Broadway, Suite 1490
11 San Diego, CA 92101
12 Tel: (619) 338-1100

13 **B. Dates of admission to practice before other courts**

14 I am admitted to practice in the following courts:

- 15 • California State Courts as of 12/14/2006 (CA 247952)
- 16 • U.S. District Court, Southern District of California as of 4/12/2007
- 17 • U.S. District Court, Central District of California as of 4/12/2007
- 18 • U.S. District Court, Northern District of California as of 4/13/2007
- 19 • U.S. District Court, Eastern District of California as of 12/23/2009
- 20 • Ninth Circuit Court of Appeals as of 5/09/2011
- 21 • United States Circuit Court of Appeals for the Sixth (2/28/2012), and
22 Eighth Circuits (5/29/2013)
- 23 • United States District Courts for the N.D. Illinois (12/05/2008)

24 **C. Name, address and telephone number of associated admitted counsel**

25 Dennis McGlothin (WSBA No. 28177)
26 Western Washington Law Group PLLC
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1 **D. Necessity for appearance by applicant**

2 I am one of the counsel for Plaintiff and the proposed Class in *Dam v.*
3 *Perkins Coie, LLP, et al.*, Case No. 2:20-cv-00464-SAB (E.D. Wash.) (the
4 "Class Action"). I have been admitted *pro hac vice* in the Class Action.

5 I am a partner of Blood Hurst & O'Reardon, LLP and specialize in class
6 action litigation. I have significant experience leading the litigation of complex
7 class action lawsuits. I have been appointed lead counsel by numerous state and
8 federal courts, including in complex and multidistrict litigation.

9 **E. Disciplinary actions or sanctions**

10 I have no pending disciplinary sanction or actions and have never been
11 subject to disciplinary sanctions by any court or Bar Association.

12 I declare under penalty of perjury under the laws of the United States of
13 America and the state of Washington, that the foregoing is true and correct.

14 Respectfully submitted on December 13, 2021.

15 *s/ Thomas J. O'Reardon*

16 Thomas J. O'Reardon II (CA 247952)
17 *Applicant for pro hac vice admission*
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19 501 West Broadway, Suite 1490
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CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will in turn automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF System. The NEF for the foregoing specifically identifies recipients of electronic notice.

Executed on December 13, 2021.

s/ Dennis McGlothlin

DENNIS J. MCGLOTHIN